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**Sent:** Saturday 12 March 2022 20:30  
**To:** Housing WildBirdDeclarations  
**Cc:** [REDACTED]  
**Subject:** Submission to public consultation - wild birds derogation Declarations for 2022/23  
**Attachments:** Submission to Public Consultation on wild birds derogation Declarations - Chapelgate Residents Association 12[2272].pdf

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**To:**  
Department of Housing, Local Government and Heritage  
National Parks and Wildlife Service

To whom it concerns

Please find attached our submission (PDF, 1 page) to the public consultation on wild birds derogation Declarations for 2022/23.

Subject to normal GDPR rules we consent to publication of our submission.

We would appreciate an acknowledgement of our submission.

Yours sincerely

[REDACTED]  
[REDACTED]  
Chapelgate Residents' Association

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Department of Housing, Local Government and Heritage  
National Parks and Wildlife Service (NPWS)  
By email to: WildBirdDeclarations@housing.gov.ie

Chapelgate Residents' Association

12th March 2022

**Public Consultation on Wild Birds derogation Declarations 2022/23 - Urban Seagulls**

To whom it concerns at the Department/NPWS:

**Comments:**

This submission is being made by Chapelgate Residents' Association, Balbriggan. We are members of the Balbriggan Community Committee (BCC) formed in 2016 to seek action on the severe impacts of seagull colonies on our community. We took part in the 700+ signatures petition submitted to the authorities in 2016, and with Clonard Street and Fullam Terrace residents we contributed over 200 signatures to the petition.

We are informed on developments with the Consultative Committee on gulls, legal advice in 2020/21, and the National Survey of Urban Gulls (2021) results. The alarming Balbriggan figure of 1,485 nests was no surprise and would have been worse but for the partial derogation directed by Minister Humphreys in 2017. We also note alarming results for Howth, Skerries, Drogheda and limited parts of Dublin that were surveyed.

We are obliged to notify the Department/NPWS of our extreme disappointment with the lack of progress on solving serious issues across our town from expanding seagull colonies. The delay since 2016 is inexcusable. Thousands of seagulls that were not in our town seven years ago are being given more protection by the State than our children, elderly and vulnerable people who are being attacked and injured by these birds. Ordinary quality of life in our homes – including a night's sleep – is being destroyed for several months every summer. What justification can the authorities offer for the huge and worsening negative impacts of seagulls on our estates, our schools and our local businesses, and for allowing this serious situation to get worse every year, and out of control? This is a serious public health and safety issue now and needs to be dealt with urgently.

The new urban seagull policy in England gives first priority to the protection of people in urban areas and strictly protects seagulls in their natural habitat – this is ordinary common sense. We must apply the same standards and priority here for the protection of public health and safety of Irish citizens. It seems clear from the Consultative Committee's legal documents that the law rightly gives priority to public health and safety, so why is the law not being applied properly? How can such a serious failure be justified? How could parents be prosecuted by the State for taking action to protect their children from aggressive, dangerous wild birds?

**Proposals:**

We propose that the following changes are urgently needed for this year and for future years:

- a) the issue is now a serious public health and safety issue and needs to be recognised as such because urban seagulls are out of control – which would not be the case if proper action was taken in 2016
- b) Fingal County Council should be providing a service like the English model for the removal of seagull nests from residential areas and from schools, creches and medical centres; failing this, a clear derogation and advice must be published in national print and broadcast media that seagulls should be prevented from breeding on people's homes, in schools, supermarkets, Hospitals etc.
- c) the necessary actions (above) must be announced early in April before the seagulls start nesting
- d) this is a long-term problem now because it has been allowed to get out of control, therefore this nonsense of having to appeal for permission to protect our community from seagulls needs to stop – the worsening issues affecting communities should never have been allowed to happen in the first place.

We require a proper solution to this serious issue to be implemented well ahead of the 2022/23 breeding season for urban seagulls, and done in a way which addresses the issues effectively and permanently in the interests of public health and safety, which should in fact be the first priority of all Government Departments.

Chapelgate Residents Association, Balbriggan